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IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON

PAUL THOMAS, MD,

Plaintiff,

v.

KATHLEEN HARDER, SAURABH GUPTA,  
ERIN CRAMER, ROBERT CAHN, JAMES  
LACE, CHARLOTTE LIN, PATTI LOUIE,  
JENNIFER LYONS, ALI MAGEEHON,  
CHERE PEREIRA, CHRIS POULSEN,  
ANDREW SCHINK, JILL SHAW,  
ANTHONY DOMENIGONI, PAULA LEE-  
VALKOV, RICK GOLDSTEIN, ERIC  
BROWN, JASON BOEMMELS, DAVID  
FARRIS,

Defendants.

Case No. 3:22-cv-00944-JR

**DEFENDANTS' RESPONSE TO PAUL  
THOMAS' OBJECTIONS TO FINDINGS  
AND RECOMMENDATIONS**

Plaintiff's Objections to the Magistrate's proposed Findings and Recommendations are no more than a repetition of the arguments made, responded to and rejected by the Magistrate. Defendants refer the Court to their briefing on the underlying motion to dismiss (Docket Nos. 6, 10), suggest that there is no basis on which to distinguish *Gambie I* or *II* or the decision in *LaTulippe*.

Accordingly, defendants suggest the Magistrate's Findings and Recommendations are appropriate, properly based on the record, and should be adopted in full by the Court.

DATED October 26, 2022.

Respectfully submitted,

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Attorney General

s/ Marc Abrams

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